

CLOSED

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DEBORAH TUCKER

v.

CARLSON HOTELS d/b/a RADISSON,
GF MANAGEMENT, INC., JOHN DOE
1-5 and ABC - XYX CORP., (such names
being fictitious)

CIVIL ACTION

NO. 2:11-cv-03941-ES-CLW

CONSENT ORDER

It is hereby ORDERED that:

1. The plaintiff, Deborah Tucker, will file the attached Amended Complaint in the United States District Court for the District of New Jersey on or before February 13, 2012;
2. Due to the joinder of WCI Grounds Maintenance Services, LLC, as a defendant in this matter, the diversity jurisdiction upon which this matter is before the United States District Court for the District of New Jersey is destroyed. This matter will be remanded to the Superior Court of New Jersey, Law Division, Middlesex County; and
3. Once this matter is remanded, the defendants will have twenty (20) days to file an Answer, or otherwise plead, to the plaintiff's Amended Complaint.

The defendants have not waived any defenses in this matter, including, but not limited to, the defense of lack of personal jurisdiction.



Sander Budanitsky, Esq.
Attorney for the Plaintiff,
Deborah Tucker

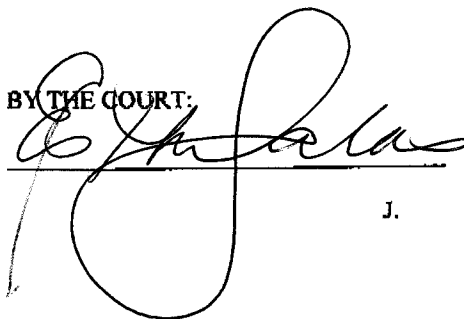


Philip D. Priore, Esq.
Franklin C. Miller, Jr., Esq.
Attorneys for Defendants, GF
Management, Inc., and Carlson
Hotels, Inc. (improperly named as
Carlson Hotels d/b/a Radisson)

DATED: 2/3/2012

DATED: 2/8/12

BY THE COURT:



J.

LAW OFFICES OF SANDER BUDANITSKY, LLC
 520 WEST FIRST AVENUE
 ROSELLE, NEW JERSEY 07203
 (908) 241-3445
 Attorney for Plaintiff(s)

DEBORAH TUCKER,	:	UNITED STATES DISTRICT COURT
	:	DISTRICT OF NEW JERSEY
	:	
Plaintiff(s),	:	Case No.: 2:11-cv-03941-ES-CLW
	:	
vs.	:	
	:	
CARLSON HOTELS d/b/a RADISSON,	:	
GF MANAGEMENT, INC., VALLEY	:	
FORGE COLONIAL LIMITED	:	
PARTNERSHIP, WCI GROUNDS	:	
MAINTENANCE SERVICES, L.L.C.,	:	SECOND AMENDED COMPLAINT
JOHN DOE 1-5 and ABC-XYZ CORP.	:	AND JURY DEMAND
(such names being fictitious),	:	
	:	
Defendant(s).	:	
	:	

Plaintiff, DEBORAH TUCKER, residing in the Borough of Roselle, County of Union and State of New Jersey by way of Complaint against the defendants, says:

FIRST COUNT

1. On or about February 13th, 2010, Plaintiff, DEBORAH TUCKER, was an invitee/guest on the premises, owned, operated, leased and/or maintained by the Defendants, CARLSON HOTELS d/b/a/ RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5 and ABC CORP.- XYZ CORP., (such latter names being fictitious), located in Valley Forge, Pennsylvania. These Defendants are

companies, entities and/or individuals having a place of business and authorized to do business in the County of Middlesex and State of New Jersey.

2. At all times herein mentioned the Defendant(s), CARLSON HOTELS d/b/a/ RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5 and ABC CORP.- XYZ CORP., (such latter names being fictitious), were engaged in the repair, maintenance and upkeep of said premises.

3. At said time and place, Plaintiff, DEBORAH TUCKER, was caused injury due to the negligence of Defendant(s), CARLSON HOTELS d/b/a/ RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5 and ABC CORP.- XYZ CORP., (such latter names being fictitious), due to improper and negligent conditions, known to exist, and/or for which defendants should have reasonably known to exist by the named Defendants.

4. At said time and place, Plaintiff, DEBORAH TUCKER, was caused injury due to the negligence of Defendant(s), CARLSON HOTELS d/b/a/ RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5 and ABC CORP.- XYZ CORP., (such latter names being fictitious), due to improper and negligent conditions, known to exist, and/or for which defendants should have reasonably known to exist by the named Defendants.

5. As a direct and proximate result of the foregoing, the Plaintiff, DEBORAH TUCKER, was caused to sustain serious, painful and permanent injuries, has experienced great pain and suffering, has suffered great shock and mental anguish, will in the future experience great pain and suffering, was caused to incur great expenses for medical care and attention, will in the future incur additional expenses, was caused to lose large sums of money for wages she would have earned but for her injuries and will in the future lose large sums of money for wages, and has in the past, and will in the future, lose her right to the full enjoyment of life.

WHEREFORE, Plaintiff, DEBORAH TUCKER, demands judgment against the Defendant(s), CARLSON HOTELS d/b/a/ RADISSON, GF MANAGEMENT, INC., VALLEY FORGE COLONIAL LIMITED PARTNERSHIP, WCI GROUNDS MAINTENANCE SERVICES, L.L.C., JOHN DOE 1-5 and ABC CORP.- XYZ CORP., jointly and/or severally, in an amount sufficient to compensate her for her injuries, medical expenses, interest and costs of suit.

DATED: December 26, 2011

Sander Budanitsky, Esq.
Attorney for the Plaintiff(s)

JURY DEMAND

Plaintiff demands a trial by jury as to all Counts of the within Complaint.

DATED: December 26, 2011

Sander Budanitsky, Esq.
Attorney for the Plaintiff(s)